

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
:
Fred Smith, Jr. : No. 19-13290-MDC
Debtor :

ANSWER TO MOTION OF PENNSYLVANIA HOUSING FINANCE AGENCY FOR
RELIEF FROM THE AUTOMATIC STAY UNDER SECTION 362
AND CERTIFICATE OF SERVICE

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied. The mortgage company did permit the payments to be put off to a future date. Debtor alleges only 3 months were missed.
7. Denied.
8. Denied.
9. Denied.
10. No response is required.

WHEREFORE Debtor respectfully requests this Honorable Court deny Movant's Motion for Relief.

/s/ David M. Offen
David M. Offen
Attorney for Debtor

Dated: 09/17/2021

A copy of this Answer is being served on Rebecca Ann Solarz, Esquire, and the Chapter 13 Trustee.